

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JILL BALLARD, REBECCA VARNO,)	
and MARK POKORNI, on behalf of)	
themselves and the class members)	
described herein,)	No. 3:18-cv-121-MEM
)	
Plaintiffs,)	Judge Malachy E. Mannion
)	
v.)	Magistrate Judge Daryl F. Bloom
)	
NAVIENT CORPORATION,)	
NAVIENT SOLUTIONS, INC., and)	ELECTRONICALLY FILED
NAVIENT SOLUTIONS, LLC,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE
THIRD AMENDED COMPLAINT**

Plaintiffs JILL BALLARD, REBECCA VARNO, and MARK POKORNI hereby move pursuant to Federal Rules of Civil Procedure 15 and 16 for leave to file their Third Amended Complaint, a redlined copy of which is attached hereto as Exhibit A, and a clean copy of the same is attached hereto as Exhibit B. Attached as Exhibit C is a Proposed Order. The reasons for this motion are set forth more fully in the accompanying brief.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' Motion for Leave to File their Third Amended Complaint.

Respectfully Submitted,

/s/ Cassandra Miller
Cassandra Miller
Illinois ARDC #: 6290238

Daniel A. Edelman
Cassandra P. Miller
**Edelman, Combs, Lattner
& Goodwin, LLC**
20 South Clark Street, Suite 1500
Chicago, IL 60603
Phone (312) 739-4200
dedelman@edcombs.com
cmiller@edcombs.com

Carlo Sabatini, PA 83831
Sabatini Law Firm, LLC
216 N. Blakely St.
Dunmore, PA 18512
(570) 341-9000
ecf@bankruptcypa.com

Anthony Fiorentino
Fiorentino Law Offices
6119 North Kenmore Ave., Ste. 410
Chicago, IL 60660
(312) 305-2850
anthony@fiorentinolaw.com

CERTIFICATE OF SERVICE

I certify that on the 28th day of March, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification to counsel of record for the defendant, namely:

Andrew J. Soven
Andrew.Soven@hklaw.Com

Daniel T. Brier
dbrier@mbklaw.com

Donna A. Walsh
dwalsh@mbklaw.com

Lisa Marie Simonetti
simonettil@gtlaw.com

Christopher Anthony Mair
mairc@gtlaw.com

Lawyers for Defendants

BY: /s/Cassandra P. Miller
Cassandra P. Miller
Illinois ARDC #: 6290238

DATED: March 28, 2024

Edelman, Combs, Lattner & Goodwin, LLC
20 South Clark Street, Suite 1500
Chicago, IL 60603
Phone (312) 739-4200
dedelman@edcombs.com
cmiller@edcombs.com